

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

SHIRLEY CRAWFORD, MATTHEW  
JORDAN, MELISSA ALEJANDRO,  
NICOLA SOBERS, JANICE BUTLER,  
PAULINE DION, LISA SAGHY, and  
RICHARD ANGEMI, individually and  
on behalf of all those similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS  
AMERICA, INC., and SAMSUNG  
ELECTRONICS CO., LTD.,

Defendants.

Civil Action No. 2:22-cv-02828-  
MCA-AME

**JOINT STIPULATED  
DISMISSAL**

[Submitted concurrently with  
[Proposed] Order]

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs Shirley Crawford, Matthew Jordan, Melissa Alejandro, Nicola Sobers, Janice Butler, Pauline Dion, Lisa Saghy, and Richard Angemi (collectively, “Plaintiffs”), on the one hand, and Defendants Samsung Electronics America, Inc. and Samsung Electronics Co., Ltd. (collectively, “Defendants”), on the other, hereby stipulate and agree that: all individual claims that Plaintiffs asserted or could have asserted on their own behalf in the litigation are hereby dismissed *with* prejudice. Plaintiffs and Defendants have resolved all issues concerning Plaintiffs’ alleged claims and the parties’ attorneys’ fees and costs.

This dismissal does not affect the rights of any putative class member. The

notice and approval requirements of Federal Rule of Civil Procedure 23(e) are inapplicable because this action has not been certified as a class, and a class is not proposed to be certified.

The parties jointly request that the Court enter the accompanying Proposed Order dismissing this action.

**IT IS SO STIPULATED**, through Counsel of Record.

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Date: August 8, 2024

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Date: August 9, 2024

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DISTRICT OF NEW JERSEY**

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**[PROPOSED] ORDER  
ENTERING JOINT STIPULATED DISMISSAL**

Having considered the parties' Joint Stipulated Dismissal of this action with prejudice as to the individual claims of Plaintiffs Shirley Crawford, Matthew Jordan, Melissa Alejandro, Nicola Sobers, Janice Butler, Pauline Dion, Lisa Saghy, and Richard Angemi (collectively, "Plaintiffs"), and good cause appearing therefore, IT IS HEREBY ORDERED that:

1. This action is dismissed *with* prejudice as to the individual claims of Plaintiffs;

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2. The parties have resolved all issues concerning attorney's fees and costs.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Madeline Cox Arleo  
United States District Judge